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JOHN CRIGLER

June 11, 1993

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

OUR FILE NO.  
0655-101

Re: Docket No. 93-99  
RM-8202


Dear Ms. Searcy:

Transmitted herewith on behalf of Sobocomo Radio, Inc. are the original and four copies of its Comments and Counterproposal in the above-captioned rulemaking.

No filing fee is required with this filing.

Please direct any communications regarding this matter directly to this office.

Sincerely yours,

  
John Crigler

JC/lgs

Enclosures (5)

Before The  
**Federal Communications Commission**  
 Washington, D.C. 20554

RECEIVED

JUN 11 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In The Matter Of )

)  
 Amendment of Section 73.202(b)  
 Table of Allotments  
 FM Broadcast Stations  
 (Moberly, Missouri)

MM Docket No. 93-99  
 RM-8202

TO: Chief, Allocations Branch

## COMMENTS AND COUNTERPROPOSAL

Sobocomo Radio, Inc. ("Sobocomo") hereby submits its comments and counterproposal to the above-captioned *Notice of Proposed Rule Making*, DA 93-365 (released April 20, 1993) ("*NPRM*").<sup>1</sup> The *NPRM* sets forth the proposal of FM 105, Inc. ("FM 105"), licensee of station KZZT-FM, Moberly, Missouri, to modify the license of KZZT-FM by substituting Channel 288C2 for 288C3 at Moberly. *NPRM*, ¶ 1. The proposal would be short-spaced with the proposal, previously made by Sobocomo<sup>2</sup> and presented as a counterproposal here, to allocate Channel 291C1 to Ashland, Missouri and make other related allotments.

1. Sobocomo is the permittee of a new FM radio broadcast station on Channel 291C2 at Ashland, Missouri (File No. BPH-880219MD).

<sup>1</sup> The *NPRM* authorized the filing of counterproposals by June 11, 1993. *NPRM*, ¶ 6. Thus, Sobocomo's comments are timely filed.

<sup>2</sup> On April 22, 1993, Sobocomo filed a Petition for Partial Reconsideration with respect to MM Docket No. 91-181. In its Petition, Sobocomo sought reconsideration of the denial of a joint proposal which would have resulted in the upgrade of its construction permit at Ashland, Missouri from Class C2 to Class C1 and a number of other allotment changes which would have brought expanded FM service to the public. That Petition is incorporated herein by reference.

No. of Copies rec'd  
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Sobocomo hereby reiterates its pending proposal to upgrade its facility from a Class C2 to a Class C1 station. This upgrade can be accomplished in compliance with the Commission's mileage separation requirements by: (1) the modification of the license of KQMX-FM, Rolla, Missouri to specify operations on Channel 276C3 rather than 292A,<sup>3</sup> and (2) the modification of the license of KDAM-FM, Monroe City, Missouri to specify operations on Channel 298A rather than 292A.

Additionally, Sobocomo proposes that if so required by Commission policy, the reference coordinates for vacant allocation, Channel 290A at Wheeling, Missouri be modified to those proposed by the sole applicant of this "first-come/first-serve" vacant allocation (BPH-930402MB).

2. Specifically, Sobocomo proposes the following amendments to the FM Table of Allotments:

<u>Location</u>	<u>Present Channel</u>	<u>Proposed Channel</u>
Ashland, MO	291C2	291C1
Rolla, MO	292A, 287C1	276C3, 287C1
Monroe City, MO	292A	298A
Wheeling, MO	290A	290A*

\*Reference coordinate change only

**Ashland Missouri.** Section 1.420(g)(3) of the Commission's rules authorizes the substitution of Channel 291C1 for Channel 291C2 and the requested modification of Sobocomo's construction permit. See Engineering Statement, Exhibit 1, Figure 1.

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<sup>3</sup> The substitution of Channel 276C3 for Channel 232A at Rolla was proposed by Sobocomo in reply comments in RM-7696/7817, but was not considered on grounds of timeliness. See *Report and Order*, DA 93-225 (March 17, 1993).

**Rolla, Missouri.** Channel 276C3 can be allocated to Rolla, Missouri in compliance with the Commission's rules at a site approximately 20 kilometers southeast of KQMX-FM's current site. See Exhibit 1, Figure 2. Progressive Broadcasting of Missouri, Inc. is the licensee of KQMX-FM and has agreed to the channel, class, and site change. See Exhibit 3.

**Monroe City, Missouri.** Channel 298A can be allocated to Monroe City, Missouri at KDAM-FM's current broadcast site. KDAM-FM would be able to broadcast at 6 kilowatts on Channel 298A. It is now limited to 3 kilowatts on Channel 292A. See Exhibit 1, Figures 3.

**Wheeling, Missouri.** The short spacing between the reference coordinates of vacant Channel 290A at Wheeling, Missouri and the proposed site of Channel 291C1 at Ashland, Missouri can be eliminated by the Commission's modification of those coordinates in this proceeding, or made moot by the grant of the sole pending application for the "first come/first serve" channel (BPH-930402MB), which specifies coordinates which are not short spaced to KYUA-FM's proposed C1 site. If Commission policy requires that the reference coordinates for Channel 290A be modified as part of this counterproposal, then Sobocomo proposes that they be modified to those specified in the pending application. See Exhibit 1, Figure 4.

3. In its present form, FM 105's proposal is short spaced to Sobocomo's proposal to upgrade its Ashland permit. Sobocomo notes, however, that the Commission could allocate Channel 288C2 to Moberly, Missouri at a site fully spaced to Sobocomo's proposed Channel 291C1 site and thereby grant both FM 105's and Sobocomo's proposal. The result of such a site restriction would be significant upgrades for four

markets. If FM 105 will not agree to move its proposed site, the Commission should grant Sobocomo's proposal and deny FM 105's petition, consistent with *Greenup, Kentucky, and Athens, Ohio*, 2 FCC Rcd. 4319 (1987), *aff'd in relevant part*, 4 FCC Rcd. 3843 (1989). The Sobocomo proposal will upgrade the signals of three stations, while the FM 105 proposal will only upgrade one station.

4. In the event that the Commission grants its proposal, Sobocomo will apply for and construct an FM radio broadcast station on Channel 291C1 at Ashland, Missouri and reimburse Progressive Broadcasting of

4. If necessary, modify the reference coordinates of vacant, but applied for Channel 290A at Wheeling, Missouri.

In the event that FM 105 modifies its proposal to include an appropriate site restriction, its proposal may also be granted. In the event that FM 105 declines to so modify its proposal to resolve the short spacing with Sobocomo's counterproposal, Sobocomo's counter-proposal should be adopted and FM 105's proposal denied.

Respectfully submitted,

SOBOCOMO RADIO, INC.

By: 

John P. Crigler  
David G. O'Neil

Its Attorneys

HALEY, BADER & POTTS  
Suite 900  
4350 North Fairfax Drive  
Arlington, VA 22203-1633  
703/841-0606  
June 11, 1993

**EXHIBIT I**  
**ENGINEERING STATEMENT**

### Engineering Statement

This Engineering Statement is prepared for Sobocomo Radio, Inc. ("Sobocomo"), permittee of Radio Station KYUA(FM) at Ashland, Missouri in support of the comments and counterproposal being filed in response to the FCC Notice of Proposed Rule Making in MM Docket No. 93-99 ("Notice"). The Notice was issued in response to the Petition for Rule Making filed by FM 105, Inc. requesting the substitution of Channel 288C2 for Channel 288C3 at Moberly, Missouri, and the modification of the license of KZZT(FM). The coordinates proposed for Channel 288C2 are short spaced with Sobocomo's requested substitution of Channel 291C1 for Channel 291C2 at Ashland, Missouri as specified in its Petition for Partial Reconsideration in MM Docket No. 91-181. All channel studies in this engineering statement are provided by a recognized communications database.

Sobocomo requests the amendment of 47 CFR 73.202(b) to substitute Channel 291C1 for Channel 291C2 at Ashland, Missouri. In order to accommodate that change, Sobocomo proposes the substitution of Channel 276C3 for Channel 292A at Rolla, Missouri, the substitution of Channel 298A for Channel 292A at Monroe City, and the modification of reference coordinates of vacant but applied for Channel 290A at Wheeling, Missouri.

### Proposed Change in FM Table of Allotments

The Comments to which this engineering statement is attached requests modification of the FM Table of Allotments, 47 CFR 73.202(b) as follows:

Present:	<u>City</u>	<u>Channel</u>
	Ashland, MO	291C2
	Rolla, MO	292A*
	Monroe City, MO	292A
	Wheeling, MO	290A

\*Channel 232A modified to Channel 292A in R&O MM Docket 91-181

Proposed:	Ashland, MO	291C1
	Rolla, MO	276C3
	Monroe City, MO	298A
	Wheeling, MO	290A**

\*\*Reference coordinate change only

### Ashland, Missouri

Sobocomo requests that Channel 291C1 be substituted for Channel 291C2 at Ashland, Missouri and that KYUA(FM)'s license be modified accordingly. At coordinates 38-46-24, 92-43-00, KYUA(FM)'s proposed Channel 291C1 site is .59 kilometers short spaced to the proposed KZZT(FM) Channel 288C2 site. See Figure 1. The other short spacings noted in Figure 1 (KQMX-Rolla, Missouri, KDAM-Monroe City, Missouri, and vacant Channel 290A in Wheeling, Missouri) would be eliminated by Commission adoption of the proposed modifications in the following paragraphs. If these modifications are made, the proposed Channel 291C1 at Ashland, Missouri can be made in conformance with Sections 73.315 and 73.215.

### Rolla, Missouri

Sobocomo and Progressive Broadcasting of Missouri, Inc. request that Channel 276C3 be substituted for Channel 292A at Rolla, Missouri and that KQMX(FM)'s license be modified. KQMX's licensee, Progressive Broadcasting of Missouri, Inc. indicates its support in Exhibit 3. As Figure 2 notes, Channel 276C3 can be allocated to Rolla in conformance with Section 73.215 at a site approximately 20 kilometers southwest of KQMX(FM)'s current site. As Map 2 indicates, the proposal will conform to 73.315. An additional C3 allocation is available for Rolla, Missouri for any other expressions of interest.

### Monroe City, Missouri

Sobocomo requests that Channel 298A be substituted for Channel 292A at Monroe City, Missouri and that KDAM(FM)'s license be modified accordingly. Channel 298A can be allocated at KDAM(FM)'s present site. KDAM(FM) is restricted to 3 kilowatts on Channel 292A, but would be able to broadcast at 6 kilowatts on Channel 298A, thereby improving service to its market. As Figure 3 and Map 3 indicate, the allocation can be made in conformance with 73.215.

### Wheeling, Missouri

Sobocomo requests that the reference coordinates for vacant Channel 290A at Wheeling, Missouri be changed to 39-53-14, 93-22-53. These are the coordinates specified in the sole application for this "first come/first serve" allocation, BPH-930402MB. These coordinates are not short spaced to the proposed site for Channel 291C1 at Ashland, Missouri. This allocation coordinate modification will also eliminate an existing short spacing to Station KLZR(FM), Channel 290C1 at Lawrence, Kansas. See Figure 4 and Map 4 from BPH-930402MB.

### **Moberly, Missouri**

The proposed allotment site for Channel 288C2 at Moberly, Missouri in FM 105's Petition for Rule Making is short spaced to the proposed Channel 291C1 site at Ashland, Missouri by less than one kilometer. While the allotment window for Channel 291C1 at Ashland is small, the channel search submitted as part of FM 105's petition shows ample room for a 1 kilometer site change for Channel 288C2. Thus, a modification of the original petition would remove any conflict between the FM 105 petition and Sobocomo's counterproposal. See Figure 5 from FM 105's petition.

### **Conclusion**

By adopting Sobocomo's proposal, the Commission will increase service in 3 markets. If the Commission modifies FM 105's proposed coordinates, the Commission can accommodate both petition and counter petition, and service in 4 communities can be improved.

State of Missouri       )  
                          )  
County of Boone        )  
                          )

ss.

Al Germond, being duly sworn, deposes and says that he is a broadcast engineer, having held an FCC General Radiotelephone License since 1972 and has submitted various technical documents and statements to the FCC which have been found acceptable by that agency.

Figure 1  
FM Spacing Study

Page 1  
May 26, 1993

Title: KYUA - Ashland, Missouri  
Channel 291C1 (106.1 MHz)  
Database: DW 05/19/93

Latitude: 38-46-24  
Longitude: 92-43-00  
Safety zone: 100 km

Call	Auth Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq EAH-m	Longitude	-from	(km)	(km)
=====							
KDKD-FM LIC	CLINTON RADIO COMPANY	237A	3	38-23-55	245.9	100.9	22
CLINTON	MO	95.3	53	93-46-19	65.2	78.92	CLEAR
Deletion proposed; ORDERED TO 237C3; Affiliated with KDKD(AM)							

## FM Spacing study

Title: KYUA - Ashland, Missouri  
Channel 291C1 (106.1 MHz)

Latitude: 38-46-24  
Longitude: 92-43-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KPNT	LIC	RIVER CITY LICENSE PARTN	289C	100	38-13-10	107.8	195.0	105
SAINTE GENEVIEVE	MO	BLH-871106KB	105.7	419	90-35-44	289.1	89.99	CLEAR
KNFX HAS BEEN WITHDRAWN AT APPLICANT'S REQUEST; Was KFXB 02/16/93 per FCC release #199 dated 02/26/93								
ALLOC			290A		39-47-12	333.2	126.4	133
WHEELING	MO	DOC-89-550	105.9		93-23-07	152.7	-6.57	SHORT
Granted effective 10/03/91, adopted 08/08/91, released 08/19/91								
ALLOC			290C3		39-41-44	48.8	157.1	144
NEW LONDON	MO	DOC-92-103	105.9		91-20-10	229.7	13.13	CLOSE
Granted effective 09/24/92, adopted 07/22/92, released 08/11/92; Filing window 09/25-10/26/92 **CLOSED** ; RM-7973; SITE RESTRICTION 8.4 MI N								
NEW	APP	PRORADIO, INC.	290C3	25	39-46-35	45.7	161.0	144
NEW LONDON	MO	BPH-921027MC	105.9	100	91-22-12	226.5	16.95	CLEAR
Received per FCC release #15387 dated 11/04/92, tendered per 15404 dated 11/30/92, accepted per NA-165 dated 12/21/92								
KGBX-FM CP		SUNBURST II, INC.	290C2	38	37-17-41	193.2	168.5	158
NIXA	MO	BMPH-920814IB	105.9	170	93-09-10	12.9	10.52	CLOSE
CP Granted 12/11/92 per FCC release #21537 dated 12/18/92; ORDERED FROM BOLIVAR, MO; Was KYOO-FM 01/09/90 per FCC release #125 dated 01/12/90								
KKOZ-FM LIC		CORUM INDUSTRIES INCORPO	290A	4.50	36-55-48	178.5	204.7	133
AVA	MO	BLH-900518KI	105.9	116	92-39-19	358.5	71.67	CLEAR
Deletion proposed; License Granted 04/11/91 per FCC release #21096 dated 04/17/91; ORDERED TO 222A; Was KCOA-FM 05/01/89								
KLZR	LIC	LAWRENCE BROADCASTERS IN	290C1	100	39-02-21	278.0	238.9	177
LAWRENCE	KS	BLH-871119KC	105.9	236	95-26-59	96.3	61.90	CLEAR
Affiliated with KLWN(AM)								
KYUA	CP	SOBOCOMO RADIO, INC.	291C2	23	38-46-29	89.3	13.95	224
ASHLAND	MO	BMPH-921112IB	106.1	220	92-33-22	269.4	-210	SHORT
CP Granted 03/31/93 per FCC release #21608 dated 04/07/93; Call Granted 06/28/91 per FCC release #161 dated 06/28/91								
WSMI-FM LIC		TALLEY BROADCASTING CORP	291B	50	39-15-21	77.7	274.1	270
LITCHFIELD	IL	BLH-800922AJ	106.1	140	89-36-48	259.7	4.069	CLOSE
Affiliated with WSMI(AM)								
KKBZ	LIC	KMA BROADCASTING LP	291C2	50	40-33-12	314.6	285.7	224
CLARINDA	IA	BLH-891002KD	106.1	150	95-07-18	133.1	61.74	CLEAR
Deletion proposed; License Granted 08/07/90 per FCC release #20924 dated 08/13/90; ORDERED TO 257C2; Was KMA-FM 01/20/92 per FCC release #174 dated 01/17/92								

## Figure 1

Page 3  
May 26, 1993

## FM Spacing study

Title: KYUA - Ashland, Missouri  
Channel 291C1 (106.1 MHz)Latitude: 38-46-24  
Longitude: 92-43-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KCII-FM ORD	WASHINGTON	RADIO INCORPO	291A		41-18-18	16.6	293.9	200
WASHINGTON	IA		106.1		91-42-36	197.3	93.94	CLEAR

DOC-89-451: ORDERED FROM 237A: Affiliated with KCII(AM)

## FM Spacing study

Title: KYUA - Ashland, Missouri  
Channel 291C1 (106.1 MHz)

Latitude: 38-46-24  
Longitude: 92-43-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KTJA	CP	MISSOURI FM	294C3	25	37-09-16	203.9	196.3	76
MOUNT VERNON	MO	BMPH-901211IE	106.7	100	93-36-58	23.4	120.3	CLEAR

CP Granted 05/29/91 per FCC release #21129 dated 06/06/91; Call Granted 09/29/89

>> End of channel 291C1 study <<

- 
1. Original MM Docket No. 93-99 Petition. Subject of this counter proposal.
  2. This counter proposal requests allocation coordinate change to those specified in BPH-930402MB: 39-53-14, 93-22-53. Measured distance is over 136 kilometers: more than 3 kilometers clearance.
  3. Sobocomo Radio, Inc. (Counter petitioner)
  4. Deletion proposed, removal to Channel 298A.
  5. Deletion proposed, removal to Channel 276C3.

47°30'

79KM from 289C2  
Knob Noster, Mo.

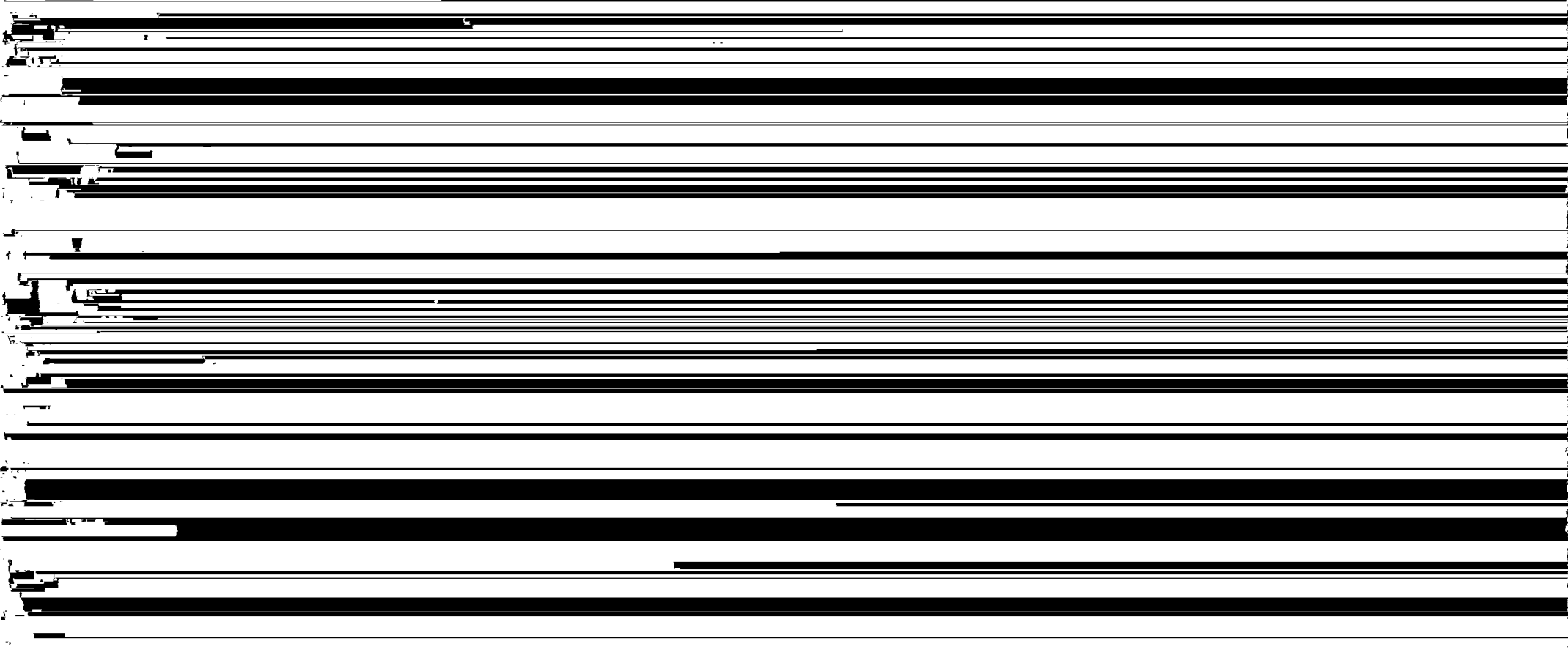
78.5KM deminimis from  
289C2 Knob Noster, Mo.

DEMINIMIS  
ALLOTMENT  
WINDOW

133.0KM from 292A Rolla, Mo.  
special reference point

132.5 deminimis from Rolla  
special reference point

46°24'



## FM Spacing study

Title: Rolla, Missouri  
Channel 276C3 (103.1 MHz)  
Database: DW 06/02/93

Latitude: 37-47-58  
Longitude: 91-39-27  
Safety zone: 45 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KKOZ-FM ORD	CORUM INDUSTRIES INCORPO	222A			36-55-48	222.7	130.9	12
AVA	MO		92.3		92-39-19	42.1	118.9	CLEAR
DOC-88-64; ORDERED FROM 290A; Was KCOA-FM 05/01/89								

KTDI	CP	CONTEMPORARY BROADCASTIN	223A	6	39-23-57	339.5	190.0	12
HUNTSVILLE	MO	BPH-890719MC	92.5	100	92-26-04	159.0	178.0	CLEAR
Deletion proposed; CP Granted 03/06/90 per FCC release #20814 dated 03/21/90; ORDERED TO 278C2; Call Granted 05/03/90 per FCC release #133 dated 05/04/90								

KKDY	LIC	MACKEY COMMUNICATIONS CO	273C2	50	36-41-22	189.8	125.0	56
WEST PLAINS	MO	BLH-900125KA	102.5	148	91-53-45	9.6	68.99	CLEAR
License Granted 11/30/90 per FCC release #21006 dated 12/07/90								

KABE	CP	HERRIN BROADCASTING, INC	274A	6	38-02-06	288.3	84.83	42
LAKE OZARK	MO	BPH-920501MB	102.7	100	92-34-31	107.7	42.83	CLEAR
CP Granted 03/12/93 per FCC release #21593 dated 03/19/93; Call Granted 04/30/93 per FCC release #203 dated 04/30/93								

KEZS-FM LIC	ZIMMER BROADCASTING COMP	275C1	100		37-24-23	102.7	190.1	144
CAPE GIRARDEAU	MO	BLH-870501KC	102.9	289	89-33-44	284.0	46.10	CLEAR
Affiliated with KZIM(AM)								

KLOW	LIC	PEMISCOT BROADCASTERS FM	276A	3	36-12-50	134.7	248.2	142
CARUTHERSVILLE	MO		103.1	59	89-41-25	315.9	106.2	CLEAR
Deletion proposed; ORDERED TO 286A; Affiliated with KCRV(AM)								

KLOU	LIC	CBS, INC.	277C1	100	38-31-47	55.2	144.0	144
SAINT LOUIS	MO		103.3	280	90-17-58	236.1	0	SHORT
Was KHTR 10/31/88; Affiliated with KMOX(AM)								

KZMA	CP	TWIN EAGLE COMMUNICATION	278C2	50	36-53-56	129.6	155.9	56
POPLAR BLUFF	MO	BPH-890217MO	103.5	150	90-18-27	310.4	99.88	CLEAR
CP Granted 10/26/90 per FCC release #20984 dated 11/07/90; Call Granted 12/12/90 per FCC release #149 dated 12/21/90								

KIRK	LIC	OZARK BROADCASTING INCOR	279C	100	37-49-10	271.7	96.01	96
LEBANON	MO	BLH-881115KC	103.7	300	92-44-51	91.0	.012	CLOSE
Affiliated with KJEL(AM)								

>> End of channel 276C3 study <<

57/0

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COLUMBIA

(468)

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Figure 3  
FM Spacing Study

Page 1  
June 7, 1993

Title: KDAM, Monroe City Missouri  
Channel 298A (107.5 MHz)  
Database: DW 06/02/93

Latitude: 39-35-12  
Longitude: 91-47-57  
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KCMQ	LIC	THE GREENFIELD GROUP, RE	244A	3	38-58-01	212.7	81.75	10
COLUMBIA	MO		96.7	49	92-18-39	32.4	71.75	CLEAR
Deletion proposed; ORDERED TO 244C3; Affiliated with KTGR(AM)								
KZBK	CP	DWIGHT CARVER	245C2	27.5	39-50-26	284.9	113.4	15
BROOKFIELD	MO	BPH-891016IA	96.9	48	93-04-48	104.0	98.39	CLEAR
CP Granted 07/05/90 per FCC release #20901 dated 07/12/90; ORDERED FROM 249A; Was KQMO 02/13/85; Affiliated with KGNG(AM)								
KKFA	CP	CENTRAL MISSOURI BCG, IN	295C	100	38-38-16	209.8	121.2	95
JEFFERSON CITY	MO	BMPH-900727IC	106.9	381	92-29-34	29.3	26.23	CLEAR
CP Granted 04/13/91 per FCC release #21099 dated 04/22/91; Was KTXV 10/05/92 per FCC release #192 dated 10/09/92; Affiliated with KLIK(AM)								
WEAI	LIC	JERDON BROADCASTING	296A	6	39-37-16	87.8	132.4	31
LYNNVILLE	IL	BMLH-910412KE	107.1	100	90-15-28	268.8	101.4	CLEAR
License Granted 01/31/92 per FCC release #21309 dated 02/06/92; Call Granted 11/06/89; Ant: Harris FML-3								
RM		RULE MAKING PETITION	297C3		38-18-00	165.5	147.5	89
GERALD	MO	DOC-92-214	107.3		91-22-30	345.8	58.49	CLEAR
Received at FCC 11/13/92 per FCC release #1922, 12/29/92; DOC-92-214; COUNTERP ROPOSAL TO DOC-92-214								
KGRS	LIC	LWM INCORPORATED	297C1	100	40-49-26	21.9	148.3	133
BURLINGTON	IA	BLH-860915KC	107.3	131	91-08-33	202.3	15.32	CLOSE
Affiliated with KBUR(AM)								
KISF	LIC	KCFM, INC.	297C	100	39-02-15	252.3	193.6	165
LEXINGTON	MO	BLH-890523KC	107.3	361BT	93-55-48	70.9	28.63	CLEAR
License Granted 02/07/92 per FCC release #21316 dated 02/14/92; Was KXXR 01/25/93 per FCC release #198 dated 02/12/93; Affiliated with KLEX(AM)								
NEW	CP	MIDWEST RADIO, INC.	298C2	50	41-34-00	328.6	259.3	166
DES MOINES	IA	BPH-870430MQ	107.5	150	93-25-18	147.6	93.26	CLEAR
CP Granted 04/20/93 per FCC release #21623 dated 04/27/93								
KOTT	CP	OTTERVILLE BROADCASTING	299A	6	38-43-55	225.6	135.0	72
OTTERVILLE	MO	BPH-910305MB	107.7	100	92-54-35	44.9	62.97	CLEAR
CP Granted 01/31/92 per FCC release #21310 dated 02/07/92; Was KSQC 05/22/92 p								

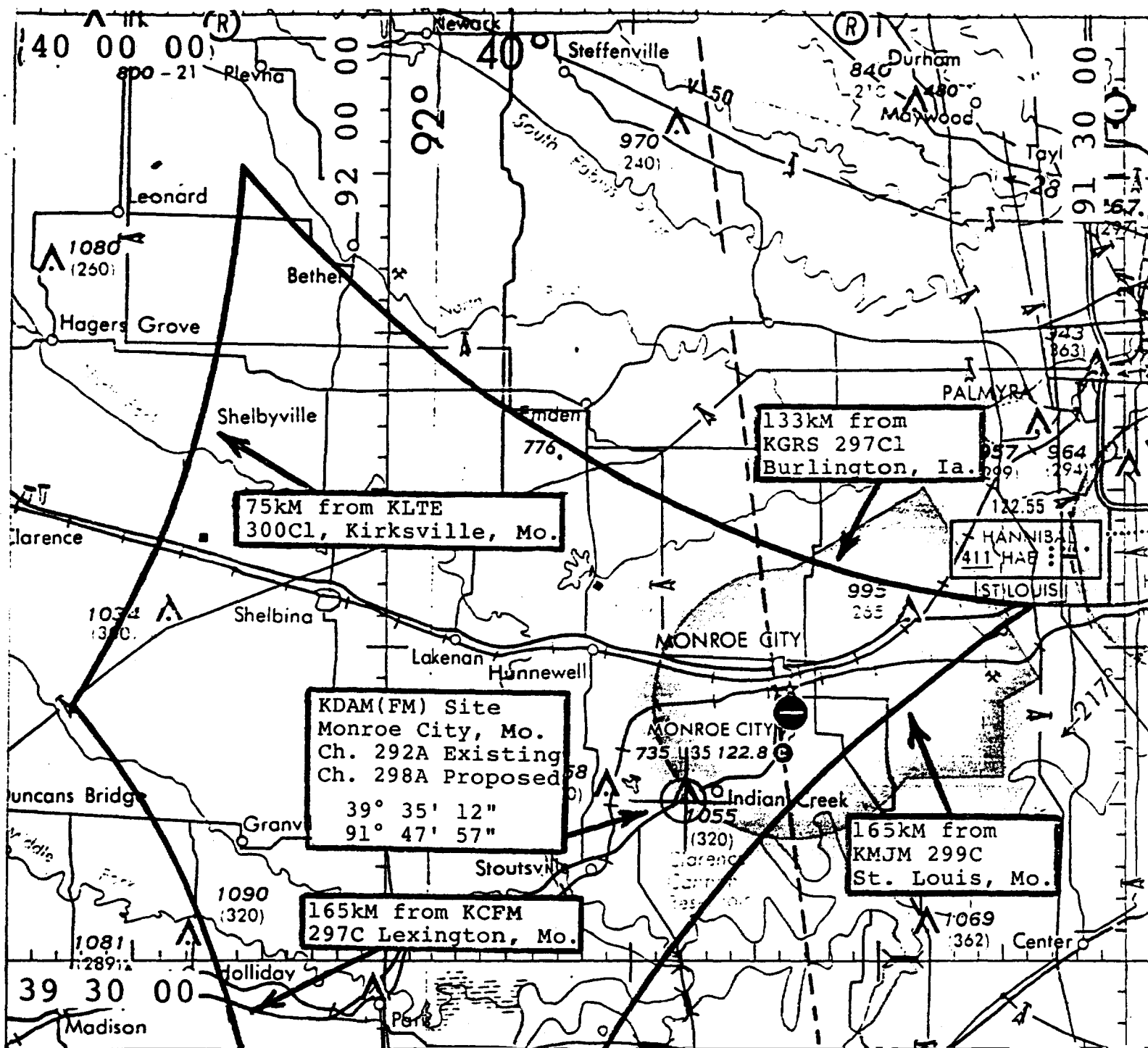


Figure 4  
FM Spacing study

Title: WHEELING  
Channel 290A (105.9 MHz)

Latitude: 39-53-14  
Longitude: 93-22-53

March 27, 1993

Figure 4

## FM Spacing study

Title: WHEELING  
Channel 290A (105.9 MHz)

Latitude: 39-53-14  
Longitude: 93-22-53

Call	Auth Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq EAH-m	Longitude	-from	(km)	(km)
KKCJ	CP	CAPITAL BROADCASTING, IN	293C1 100	39-04-24	226.7	131.1	75
LIBERTY	MO	BPH-910514IC	106.5 299	94-29-06	46.0	56.08	CLEAR

CP Granted 09/10/91 per FCC release #21206 dated 09/13/91; Application for License (BLH-930218KE) accepted per FCC release #15475 dated 03/08/93; Was KXXR 03/09/92 per FCC release #178 dated 03/13/92; Ant: Shiveley 6810-6

>> End of channel 290A study <<

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

CHULA QUADRANGLE  
MISSOURI  
7.5 MINUTE SERIES (TOPOGRAPHIC)

E

D

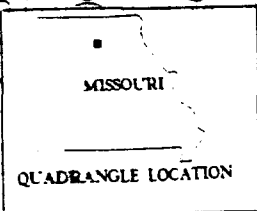
I

C

I

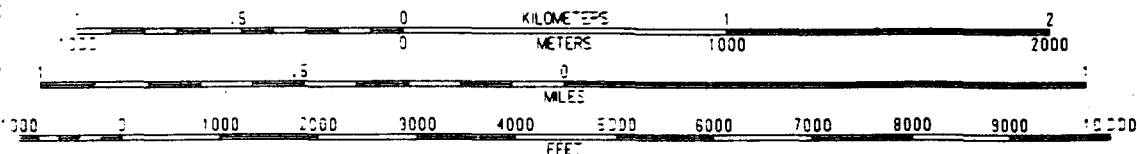
N

E



39 DEGREES 55 MINUTES 00 SECONDS

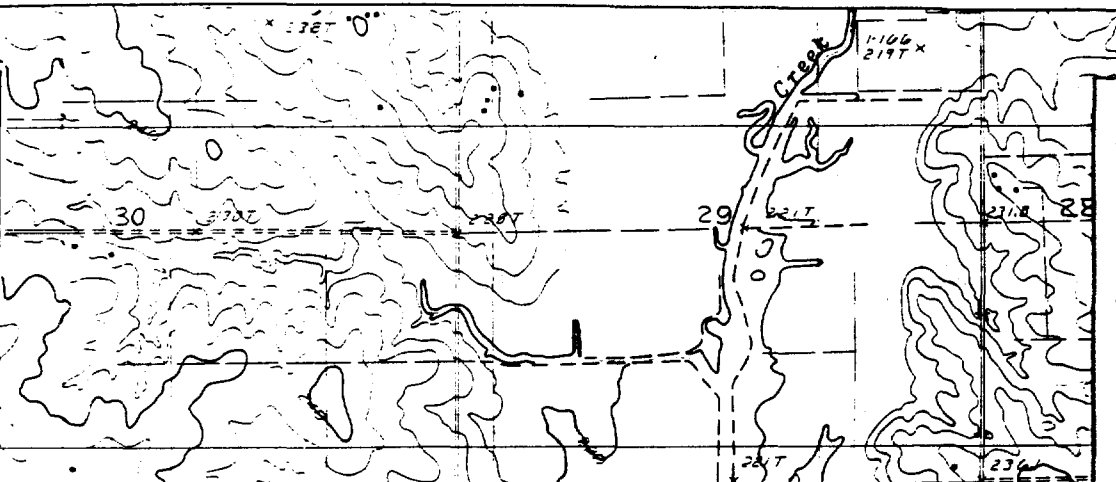
SCALE 1:24 000



CONTOUR INTERVAL 4 METERS

SUPPLEMENTAL CONTOUR INTERVAL 2 METERS

5 MINUTES 00 SECONDS



MINUTES 30 SECONDS

SINGLE CLASS CHANNEL STUDY  
 FM CHANNEL 288 C2 105.5 MHZ  
 MOBERLY, MISSOURI  
 SEARCHING: MO,IA,IL,AR,OK,KS,NE

Figure 5

DATABASE DATE: 01-27-1993  
 RUN DATE: 02-26-1993

LATITUDE: 39 25 45  
 LONGITUDE: 92 22 49

\*\*\*\*STUDY USES 6 KW CLASS A SEPARATIONS\*\*\*\*

CHANNEL & CLASS	CALL	STATUS	CITY	ST	COORDINATES	MINIMUM KM	CALCULATED KM (MI)
234			NONE				
235			NONE				
285			NONE				
286			NONE				
287C1		USED	Rolla	MO	375239 914445	158	180.9(112.4)
287C1	KZNN	LIC	Rolla	MO	375239 914445	158	180.9(112.4)
1/ *288A	KXXK	LIC	Knob Noster	MO	384628 933734	166	130.0( 80.8)
*288C3	KZZT	CP	Moberly	MO	392454 922436	177	3.0( 1.9)
*288C3		USED	Moberly	MO	392454 922436	177	3.0( 1.9)
*288A	KZZT	LIC	Moberly	MO	392454 922436	166	3.0( 1.9)
288A	KELR-FM	LIC	Chariton	IA	410050 931723	166	192.2(119.5)
288A	KILJ-FM	LIC	Mount Pleasant	IA	405632 913408	166	181.7(112.9)
288C3 DS	KILJ-FM	CP	Mount Pleasant	IA	405655 913355	177	182.4(113.4)
288C3		USED	Mount Pleasant	IA	405404 912621	177	182.0(113.1)
288A	WJVO	LIC	South Jacksonvi	IL	394320 901143	166	190.5(118.4)
288A		USED	South Jacksonvi	IL	394320 901143	166	190.5(118.4)
289C3		USED	Knob Noster	MO	384628 933734	117	130.0( 80.8)
289C3	KXXK	CP	Knob Noster	MO	384628 933734	117	130.0( 80.8)
289C3	KXXK	DEL	Knob Noster	MO	384628 933734	117	130.0( 80.8)
289C2	KXXK	ADD	Knob Noster	MO	384628 933734	130	130.0( 80.8)
289C		USED	St. Genevieve	MO	381310 903544	188	205.1(127.5)
289C	KFXB	LIC	St. Genevieve	MO	381310 903544	188	205.1(127.5)
290			NONE				
291C2		DEL	Ashland	MO	384629 923322	58	74.2( 46.1)
291C1		ADD	Ashland	MO	384339 924039	79	82.0( 51.0)
291C2		USED	Ashland	MO	384407 921853	58	77.2( 48.0)
291C2	KYUA	CP	Ashland	MO	384629 923322	58	74.2( 46.1)
291C2	KYUA	APP	Ashland	MO	384629 923322	58	74.2( 46.1)

NONE indicates clearance within a 32 km (20 mi)  
 extension of the required minimum separation.

DS indicates a Directional Antenna under  
 Section 73.215 (SHORT SPACED) is used.

The data used in this study is taken from the FCC FM Engineering Database  
 released by the Commission on 01-27-1993. The data is considered as a  
 secondary source and may not agree with information contained in the primary  
 source (see Section 0.434(e) of the Rules).

Doug C. McDonell, Technical Consultant does not assume any responsibility for  
 erroneous or incomplete data contained in the FCC Database.

1/ See Text

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 2830 WAHNESSA AVENUE

**EXHIBIT 2**